

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SCOTT GRIFFITH COLLABORATIVE  
SOLUTIONS, LLC,

Plaintiff,

v.

FALCK NORTHERN CALIFORNIA  
CORP., et al.,

Defendants.

Case No. 19-cv-06104-SBA (JCS)

**ORDER REGARDING DISCOVERY  
DISPUTE**

Re: Dkt. No. 79

For the reasons stated at the October 23, 2020 hearing on the parties October 2, 2020 joint discovery letter brief (dkt. 79), the Court ORDERS as follows:

**As to document requests 7, 8, 10, 11:**

Plaintiff shall produce all documents<sup>1</sup> regarding the failed effort by SGC's client AMR to secure the Alameda County contract referenced in Paragraph 38 of the complaint.

Plaintiff shall produce all documents related to any contracts AMR allegedly lost because of Defendants' conduct alleged in the complaint.

**As to document requests 6, 12, and 13:**

Plaintiff shall produce all communications with third parties related to Defendants' alleged use of material protected by Plaintiff's copyrights and trademarks.

**As to document requests 17, 20, and 21:**

Relief is denied, without prejudice to bringing a fully briefed motion addressing potential waiver of privilege.

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<sup>1</sup> All references herein to "all documents" include (but are not limited to) internal documents, such as emails.

**As to documents requests 47 through 52:**


Plaintiff shall produce all quarterly and annual financial statements, income statements, and balance sheets from 2013 to the present. The Court will not require production of fee reimbursement and confirming letters.

\* \* \*

All of the above documents shall be produced no later than November 6, 2020. The parties are ordered to meet and confer regarding any remaining disputes, including as to issues of privilege.

**IT IS SO ORDERED.**

Dated: October 23, 2020

  
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JOSEPH C. SPERO  
Chief Magistrate Judge